## EXHIBIT 6

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                          Allan
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                UNITED STATES DISTRICT COURT
                SOUTHERN DISTRICT OF NEW YORK
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       SANDRA GUZMAN,
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                    Plaintiff,
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                   vs.
                                      ) 09CIV9323
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                                      ) (BSJ(RLE)
       NEWS CORPORATION, NYP HOLDINGS,)
       INC., d/b/a THE NEW YORK POST, )
7
       and COL ALLAN, in his official )
       and individual capacities,
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9
                   Defendants.
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     (Contains Confidential & Attorneys' Eyes Only Portions Bound Separately)
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13
          VIDEOTAPED DEPOSITION OF COLIN ALLAN
1.4
                     New York, New York
15
                 Tuesday, February 14, 2012
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       Reported by:
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       Philip Rizzuti
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       JOB NO. 46188
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A. I guess back in 2002 or '3.  Q. Was that case here in New York?  A. Yes, sir.  Q. What type of case?  A. It was a case of age  Page 8  A. It was settled.  Q. So I want to go over a couple of rules that will cover this deposition. If I ask you a question and you don't understand it just tell me. I have an obligation to ask it again so you do understand it. Okay?  A. I understand.  Q. The other important rule to follow is both of us have to speak on the record, so all your answers have to be verbal. As you a can see there is a court reporter sitting next to you that is creating a deposition transcript. Do you understand that?  A. Yes.  Q. If there is any reason why you want to take a break, stretch your legs or go to what is creating in the control of the restroom just let me know and we will  A. Yes, I did. Q. Did that matter end up going to court?  A. No, sir.  Q. What happened to that case?  A. No, Sir.  A. No.  A. I am an employee of the New York Post are located?  A. 1211 Sixth Avenue.  Q. Here in New York City?  A. Yes.  A. 1211 Sixth Avenue.  Q. So the corporate offices of News Corp. and the editorial and the business offices of the New York Post are located in				
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24 Q. What type of case? A. It was a case of age  Page 8  Page 8  Page 8  A. It was settled.  A. It was settled.  Q. So I want to go over a couple of ask you a question and you don't understand it just tell me. I have an obligation to ask it again so you do understand it. Okay?  A. I understand.  Q. The other important rule to follow is both of us have to speak on the record, so 11 all your answers have to be verbal. As you 12 can see there is a court reporter sitting next to you that is creating a deposition to take a break, stretch your legs or go to the restroom just let me know and we will  A. It was a case of age  Page 8  Page 9  A. No.  Q. Mr. Allan, are you an employee of the New York News Corporation?  A. I am an employee of the New York Post corporate offices are located?  Post.  Q. Do you know where News Corp.'s corporate offices are located?  A. 1211 Sixth Avenue.  Q. Here in New York City?  A. Yes.  Q. And where is the business and editorial offices of the New York Post located?  A. 1211 Sixth Avenue.  Q. So the corporate offices of News Corp. and the editorial and the business offices of the New York Post are located in		· ·		
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9 Q. The other important rule to follow 10 is both of us have to speak on the record, so 11 all your answers have to be verbal. As you 12 can see there is a court reporter sitting next 13 to you that is creating a deposition 14 transcript. Do you understand that? 15 A. Yes. 16 Q. If there is any reason why you 17 want to take a break, stretch your legs or go 18 to you that is creating a deposition 19 A. 1211 Sixth Avenue. Q. And where is the business and editorial offices of the New York Post 10 located? A. 1211 Sixth Avenue. Q. So the corporate offices of News Corp. and the editorial and the business 17 corp. and the editorial and the business 18 offices of the New York Post are located in	8		8	
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transcript. Do you understand that?  14 located?  15 A. Yes.  16 Q. If there is any reason why you  16 Q. So the corporate offices of News  17 want to take a break, stretch your legs or go  18 to the restroom just let me know and we will  19 located?  10 Q. So the corporate offices of News  10 Corp. and the editorial and the business  10 offices of the New York Post are located in				
15 A. Yes.  Q. If there is any reason why you  Want to take a break, stretch your legs or go to the restroom just let me know and we will  A. 1211 Sixth Avenue.  Q. So the corporate offices of News Corp. and the editorial and the business offices of the New York Post are located in				
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want to take a break, stretch your legs or go to the restroom just let me know and we will  Corp. and the editorial and the business offices of the New York Post are located in				
to the restroom just let me know and we will 18 offices of the New York Post are located in			i .	
	1		}	
19 take breaks. I would ask that if I am in the 19 the same building here in New York City?	19	take breaks. I would ask that if I am in the	19	the same building here in New York City?
20 middle of asking a question or series of 20 A. Correct.				
questions, let me finish and then we can take 21 Q. Have they been located in that			4	
22 a break? 22 same building throughout your tenure at the				
23 A. I understand. 23 company?				
Q. Is there any reason why you can't 24 A. Yes.				
testify truthfully today? 25 Q. Does News Corp. occupy any			ŧ .	

A Allan A I don't know. A I don't know. A I don't know. A I don't know. A I don't know lei so not he board. A I know he is on the board. A I know he is on the board. A I know he is on the board. A Never. A Yes. A I don't know. A I don't know. A He is on the Board of Directors. A He is on the Board of Di		Page 82		Page 83
2 A. I don't know. 3 Q. How do you know that he is on the board? 5 A. I know he is on the board. 6 Q. I am asking you what is the basis of your knowledge; have you been at board meetings? 9 A. No. 10 Q. So how do you know that he is on the board? 11 the board? 2 A. I have seen his name on the list of members of the board. 4 Q. Does James Murdoch have an office at 1211 Avenue of the Americas? 1 A. I don't know. 1 A. I don't know. 1 G. Have you ever spoken to James at 1211 Avenue of the Americas? 2 Murdoch in connection with performing your duties as Editor-in-Chief of the New York Post? 2 Q. You ever communicate with James Murdoch about Sandra Guzman? 3 Murdoch about Sandra Guzman at all? 4 A. Never. 2 Q. You ever communicate with James Murdoch habout Sandra Guzman was sandra was in the room, that was — he was in the process of hiring her.  Page 84  1 Allan Q. So Lachlan Murdoch hired Sandra Guzman? 4 A. Never. 2 Q. What happened in that meeting with you, Lachlan Murdoch habout Sandra Guzman was in the room, that was — he was in the process of hiring her.  Page 84  1 Allan Q. So Lachlan Murdoch hired Sandra and he informed me that he was employing and he informed me that he was employing Sandra to produce a Latino section for the paper. 2 Q. Did he say anything else about her? 3 A. Lachlan introduced me to Sandra and he informed me that he was employing Sandra to produce a Latino section for the paper. 4 A. I don't recall. 5 Q. Did he say anything else about her? 6 Q. Welcomed her to — A. I don't recall and but Sandra Guzman in that meeting with you, Lachlan Murdoch and Sandra Guzman? 4 A. Lachlan introduced me to Sandra and he informed me that he was employing sandra to produce a Latino section for the paper. 5 Q. Did he say anything else about her? 6 Q. Welcomed her to — Q. Of the heave you spoke to himed the duties and the process of hiring her. 6 Q. Welcomed her to — Q. Of the ham speaking to Lachlan Murdoch about Sandra Guzman in that meeting with you, Lachlan flow of the member of the member of the member	1		1	Allan
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4 A. Never.  Q. Iam asking you what is the basis of your knowledge; have you been at board metings?  A. No. Q. So how do you know that he is on the board? A. No. Q. So how do you know that he is on the board? A. I have seen his name on the list of members of the board. Q. Does James Murdoch have an office at 1211 Avenue of the Americas? A. I don't know. Q. Have you ever spoken to James Murdoch in connection with performing your duties as Editor-in-Chief of the New York Post? A. Never. Q. You ever communicate with James Murdoch about Sandra Guzman? A. Never. Q. You ever communicate with James Murdoch about Sandra Guzman when she was hired. Q. Can you describe the substance of your conversation with Lachlan Murdoch about Sandra Guzman? A. Never. Q. About Austin Fenner?  Page 84  A. Never. Q. About the monkey cartoon? A. Never. Q. You ever spoke to Lachlan Murdoch in dimatout Sandra Guzman? A. He is on the Board of Directors. Q. Do you recall when you spoke to him about Sandra Guzman? A. Never. Q. Oy ou ever spoken to James at 1211 Avenue of the New York Post? A. Never. Q. You ever communicate with James and Murdoch about Sandra Guzman at all? A. Never. Q. About Austin Fenner?  Page 84  A. Never. Q. About Mardoch about Sandra Guzman when she was libred? A. Yes, when he was publisher of the Post. Q. What happened in that meeting with you, Lachlan Murdoch and Sandra Guzman? A. Yes, when he was employing and he informed me that he was employing and he in	1		1	
A. I know he is on the board. Q. I am asking you what is the basis of of your knowledge, have you been at board meetings? A. No. Q. So how do you know that he is on the board? A. I have seen his name on the list of members of the board. Q. Does James Murdoch have an office at 1211 Avenue of the Americas? A. I don't know. Q. Have you ever spoken to James Murdoch in connection with performing your dities as Editor-in-Chief of the New York Post? A. Never. Q. You ever spoke to Lachlan Murdoch's position at News Corp.? MR. LERNER: Objection. A. He is on the Board of Directors. Q. Day ou gove real when you spoke to him about Sandra Guzman? A. Never. Q. You ever communicate with James at 1211 A. Never. Q. You ever communicate with James was bired. Q. Can you describe the substance of your conversation with Lachlan Murdoch about Sandra Guzman? A. Never. Q. About Austin Fenner?  Page 84  A. Ayes, when he was publisher of the Post. Q. What happened in that meeting with you, Lachlan Murdoch and Sandra Guzman? A. A yes, when he was publisher of the paper. Q. What happened in that meeting with you, Lachlan Murdoch and Sandra Guzman? A. A yes, when he was publisher of the paper. Q. Did he say anything else about here intered and the informed me that he was employing Sandra to produce a Latino section for the paper. Q. Did you speak to Ms. Guzman at the time? A. I welcomed her. Q. Welcomed her to — Q. Did you speak to Ms. Guzman at the time? A. The Post. Q. Welcomed her to — Q. Welcomed her to — Q. Welcomed her to — Q. So she had already been hired? A. The Post. Q. You can't recall any other substantive conversations that you had with her processed in that well and murdoch about Sandra Guzman in that meeting and the processed with him again about Ms. Guzman on any occasion? A. I don't recall. Q. Welcomed her to — Q. So she had already been hired? A. The first conversation with Lachlan Murdoch about Sandra Guzman in that meeting? A. Geoff Booth! Think. Q. Whe is each all the company? A. Never. Q. Welcomed her to — Q. Did you s	i		1	
6 Q. I am asking you what is the basis of your knowledge; have you been at board meetings? 9 A. No. Q. So how do you know that he is on 10 the board? 12 A. I have seen his name on the list of members of the board. Q. Does James Murdoch have an office at 1211 Avenue of the Americas? 15 at 1211 Avenue of the Americas? 16 A. I don't know. Q. Have you ever spoken to James Murdoch in connection with performing your lattices as Editor-in-Chief of the New York Post? Q. You ever communicate with James 22 Murdoch about Sandra Guzman at all? A. Never. Q. About Austin Fenner? Page 84  1 A. Never. Q. About Austin Fenner? Page 84  1 A. Yes, when he was publisher of the Post. Q. What happened in that meeting with you, Lachlan Murdoch and Sandra Guzman? A. Yes, when he was publisher of the Post. Q. Did you speak to Ms. Guzman at the time? A. I don't recall. Q. Did he say anything else about her? A. I welcomed her to Q. Did he say anything else about her? A. The Post. Q. Welcomed her to Q. So she had already been hired? A. Yes. Q. You had nothing to do with her infiring; correct? A. You were respoke to Lachlan Murdoch about Sandra Guzman? A. Yes. Q. You over communicate with James and he informed me that he was employing Sandra to produce a Latino section for the paper. A. I don't recall. Q. Did he say anything else about her? A. I don't recall. Q. What is Lachlan Murdoch sout Sandra Guzman? A. He was lachlan Murdoch about Sandra Guzman when she was hired? A. When she was hired? A. The Post. Q. Did he say anything else about her? A. I don't recall. Q. Did he say anything else about her? A. I don't recall. Q. Did he say anything else about her? A. I don't recall. Q. What anyone else in that meeting? A. He was the general manager. Q. Of the New York Post? A. Never. Q. Batalan Murdoch about Sandra Guzman in that meeting did you ever speak with him again about Ms. Guzman on any occasion? A. I am sure I did, but I don't recall. Q. You can't recall any other substantive conversations that you had with	1		1 -	_
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A. I welcomed her.  Q. Welcomed her to  18 Q. Welcomed her to  19 A. The Post.  Q. So she had already been hired?  A. Yes.  Q. You had nothing to do with her  21 hiring; correct?  A. I welcomed her.  17 Murdoch about Sandra Guzman in that meeting did you ever speak with him again about Ms.  18 Guzman on any occasion?  20 A. I am sure I did, but I don't recall.  21 Pour can't recall any other substantive conversations that you had with		` ' '	1	
Q. Welcomed her to  18 did you ever speak with him again about Ms.  19 A. The Post.  19 Guzman on any occasion?  20 A. I am sure I did, but I don't  21 A. Yes.  21 recall.  22 Q. You had nothing to do with her  23 hiring; correct?  28 did you ever speak with him again about Ms.  49 Guzman on any occasion?  20 A. I am sure I did, but I don't  21 recall.  22 Q. You can't recall any other  23 substantive conversations that you had with			ł	Murdoch about Sandra Guzman in that meeting
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A. Yes.  Q. You had nothing to do with her  hiring; correct?  A. Yes.  Q. You can't recall any other  substantive conversations that you had with	1		1	
Q. You had nothing to do with her hiring; correct?  Q. You had nothing to do with her substantive conversations that you had with	1		1	
23 hiring; correct? 23 substantive conversations that you had with	1		3	
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
24 A. No, sir. 24 Lachlan Murdoch regarding Sandra Guzman?	1			Lachlan Murdoch regarding Sandra Guzman?
Q. You had nothing to do with the 25 A. I can't.	1		1	

	Page 138		Page 139
1	Allan	1	Allan
2	you said in the meeting with Joe Rabinowitz,	2	Q. Was there a separate meeting that
3	Paul Carlucci and Jennifer Jehn regarding	3	you had where Paul Carlucci was present where
4	Ms. Guzman's 2009 employee evaluation?	4	you also discussed Sandra Guzman?
5	A. No.	5	A. Yes.
		6	di d
6	Q. Did you ever speak to Paul	7	Q. Who was in that meeting? A. I believe Jennifer Jehn and/or Amy
7	Carlucci on any other occasion about Sandra	8	A. I believe Jennifer Jehn and/or Amy Scialdone.
8	Guzman?		1
9	A. Yes. Insofar as the decision to	9	Q. Anyone else?
10	close Tempo was fundamentally made at the	10	A. I don't recall.
11	Executive Committee.	11 12	Q. Was Paul Carlucci in that meeting?
12	Q. What did you say to Paul Carlucci	ł	A. Yes.
13	about Sandra Guzman when you talked about	13	Q. Who mentioned Sandra Guzman in
14	closing Tempo?	1.4	that meeting?
15	A. Nothing, I listened.	15	A. Either Paul or Jennifer.
16	Q. Did anyone mention Sandra Guzman	16	Q. What did either Paul or Jennifer
17	in that meeting?	17	say about Ms. Guzman in the meeting?
18	A. I don't recall.	18	A. Paul said that he had made the
19	Q. Well let me make it clear, make	19	decision to close Tempo, and that this meant
20	sure the record is clear. The meeting that	20	that Sandra Guzman would be terminated.
21	you were in with Paul Carlucci, Amy Scialdone	21	Q. Did he say anything else?
22	and Jennifer Jehn and Joe Rabinowitz was a	22	A. I don't recall.
23	meeting where her performance was being	23	Q. So who made the decision to
24	evaluated; correct?	24	terminate Ms. Guzman?
25	A. Yes.	25	A. Paul Carlucci.
	Page 140		Page 141
1	Allan	1	Allan
2	Q. Why was she terminated?	2	for the record if you turn to the first page
3	A. The section was closed.	3	of Allan Deposition Exhibit 4, it is entitled
4	Q. Do you recall speaking to Paul	4	Defendant News Corporation's Objections and
5	Carlucci on any other occasion about Sandra	5	Responses to Plaintiff's First Set of
6	Guzman?	6	Interrogatories. If you go to interrogatory
7	A. No.	7	number 19 it says: Identify each member of
8	Q. Did you have any role in the	8	the Board of Directors of Defendants News
9	decision to terminate Ms. Guzman?	9	Corporation, Post. And objection and
10	A. No.	10	responses stated, it says: Defendants states
11	Q. I am showing you now what has been	11	that Jose Maria Aznar, Natalie Bancroft, Peter
12	marked as Allan Deposition Exhibit number 4.	12	Barnes, Chase Carey, Kenneth Cowley, David
13	(Allan Exhibit 4, Defendant News	13	Devoe, Viet Dinh, Roderick Eddington, Mark
14	Corporation's Objections and Responses	1.4	Hurd, James Rupert Murdoch, Andrew S.B.
15	to Plaintiff's First Set of	15	Knight, Keith Rupert Murdoch, Lachlan Murdoch,
16	Interrogatories, marked for	16	Thomas J. Perkins, Arthur M. Siskind and John
17	identification, as of this date.)	17	L. Thornton comprise the Board of Directors of
	·	18	Defendant News Corp.
18	Q. I want to direct your attention to	μο 19	Do you see that, sir?
19	page 15, and specifically to interrogatory	20	MR. LIPPNER: Objection.
	number 19.	21	<u>-</u>
20	A Dagg 159	V. I	A. Yes.
21	A. Page 15?	3	<b>!</b>
21 22	Q. Yes. You see at the top	22	Q. Who is David Devoe, Mr. Allan?
21 22 23	Q. Yes. You see at the top interrogatory number 19?	22 23	<ul><li>Q. Who is David Devoe, Mr. Allan?</li><li>A. He is the CFO of News Corp.</li></ul>
21 22	Q. Yes. You see at the top	22	Q. Who is David Devoe, Mr. Allan?

<u></u>	Page 394		Page 395
_	•	4	
1	Allan	1	Allan
2	sir?	2	A. I don't recall.
3	A. I don't recall.	3	Q. Would it have been inappropriate
4	Q. Was she allowed to go to cover	4	for an article to have been published about
5	that ceremony for the New York Post?	5	Kevin Rudd in the New York Post based on your
6	A. No.	6	relationship with him?
7	Q. Why not?	7	A. I didn't have a relationship with
8	A. Because she had told us that she	8	him.
9	was a friend of Justice Soto Mayor and	9	MR. LERNER: Objection.
10	therefore I felt that she had been conflicted.	10	Q. He was a friend of yours; correct?
11	Q. Conflict?	11	A. No. I never testified that he was
12	A. Yes. We don't assign people to	12	a friend. I knew him for one day.
13	cover people on the basis of friendships.	13	Q. Now Ms. Guzman was terminated in a
14	Q. When Kevin Rudd ran for Prime	14	meeting with Joe Rabinowitz and someone from
15	Minister of Australia did you cover him in the	15	HR; correct?
16	New York Post?	16	A. I don't know.
1.7	A. No.	17	Q. Let me ask you, do you know who
18	Q. Is it your testimony that there	18	conveyed to Ms. Guzman that she was being
19	was not a single article written in the New	19	terminated as an associate editor at the Post?
20	York Post can I finish about the fact	20	A. Jennifer Jehn.
21	that Kevin Rudd was running for Prime Minister	21	Q. How do you know that Jennifer Jehn
22	of Australia?	22	conveyed that to her?
23	A. I don't recall it.	23	A. She is the head of HR.
24	Q. Do you recall if there was ever an	24	Q. Other than the fact that she is
25	article in the New York Post about Kevin Rudd?	25	the head of HR do you know if Jennifer Jehn
~~.~~	Page 396		Page 397
1	Allan	1	Allan
1	actually met with Ms. Guzman in connection	2	A. Yes.
2		3	
3	with the termination?	4	Q. Do you see it states open, Haberman, Z, associate metro editor?
4	A. That is my recollection.	5	A. Yes.
5	Q. Mr. Allan, I am now showing you	6	
6	Allan Deposition Exhibit 21, which is Bates		
7	stamped NYP 3892, I ask you to take a moment	7	there was an open associate editor position at
8	to look at that document.	8	the paper; is that correct?
9	(Allan Exhibit 21, Bates stamped	9	A. Correct.
10	NYP 3892, marked for identification,	10	Q. Was any discussion Mr. Allan about
11	as of this date.)	11	possibly allowing Ms. Guzman to remain
12	A. Yes.	12	employed at the company after Tempo was
13	Q. Do you recognize this document	13	closed?
14	sir?	14	A. Yes. I asked three editors if
1.5	A. Yes.	15	there was a position in their departments or
16	Q. What is it?	16	anywhere at the paper that Ms. Guzman might
17	A. An open jobs report.	17	fill at her compensation.
18	Q. What is an open jobs report?	18	Q. Who were those three editors?
19	A. Jobs that are vacant at the	19	A. Michelle Gotthelf, Jesse Angelo
20	newspaper.	20	and Catherine Pushkar.
21	Q. This one is dated October 12,	21	Q. Who is Catherine Pushkar?
22	2009; correct?	22	A. She was a features editor.
23	A. Yes.	23	Q. Did you meet with those three
	Q. So this is dated weeks after Ms.	24	editors together or individually when you
24	Q. 00 min in min		inquired as to whether there was another

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	Page 398		Page 399
	·	-	_
1	Allan	1	Allan
2	position for Ms. Guzman?	2	was a difference between the salary, but why
3	MR. LIPPNER: Objection.	3	didn't you at least offer it to Ms. Guzman
4	A. Independent.	4	before she was fired?
5	Q. Did you take any notes?	5	A. It is my view that an employee who
6	A. No.	6	had been forced to take a very large pay cut
7	Q. Where did those meetings take	7	in the order of \$55,000 or \$50,000, would not
8	place?	8	be a happy employee.
9	A. I don't recall.	9	Q. Is it your position that that
10	3 1	10	employee would be happier losing \$137,000 as
11		11	opposed to 50,000?
12		12	MR. LERNER: Objection.
13		13	A. I made that decision in the
14	Post?	14	interest of the newspaper. I didn't believe
15	A. Metro desk is the city desk, it is	15	it was appropriate or right to offer her a job
16	responsible for the reporters who cover the	16	that would have caused her such a significant
17	city.	17	pay cut.
18		18	Q. Did you think it was more
19		19	appropriate to fire her, she would have no
20	Q. Why wouldn't Ms. Guzman be allowed	20	job?
21		21	A. She was hired to produce Tempo,
22		22	Tempo had ceased to exist.
23	1 1	23	Q. But she worked on 25 other
24	1	24	sections
25		25	MR. LIPPNER: Were you done with
***************************************	Page 400		Page 401
1	Allan	1	Allan
2	your answer?	2	Q. Isn't it true that you never once
3	THE WITNESS: Yes.	3	considered offering Ms. Guzman that open
4	Q. She was working on 25 other	4	position that became vacant after Zach
5	sections of the paper at the time the Tempo	5	Haberman left the paper?
6	was closed; is that correct?	6	A. I considered it and I decided not
7	MR. LERNER: Objection. That is a	7	to do it.
8	fact not in evidence.	8	Q. Mr. Allan, could you put the
9		9	Deposition Exhibit 4 in front of you?
10		10	A. Exhibit 4.
11		11	Q. It should be there?
12	`	12	
13		13	=
1.3		14	Q. It is number 5 look at this one?
1	3	ŧ	
15	E	15 16	
16	Q. How many other sections?	16 17	Q. I want to direct your attention to
17	A. I don't know.	ł	page 7 of that document?
18	, ,	18	MR. LERNER: What exhibit number?
19	r · · ·	19	MR. THOMPSON: 5.
20		20	Q. Do you see where it says
21	1 1	21	interrogatory number 8?
22	,	22	A. Yes.
23	8	23	Q. Do you see there is a list of
24	57	24	names there and in response to that
25	it was small.	25	interrogatory, Bill Hoffman, Zach Haberman,